

EXHIBIT A

1 The Debtors' Proposed Estimation Hearing Structure

2 The Debtors propose a single 8 to 12-court day hearing to estimate the aggregate value of
3 the Wildfire Claims. The hearing will focus on evidence on a set of discrete liability issues that
4 materially affect the aggregate value of the claims as well as valuation of the overall size of the
5 wildfire claims, including through the use of relevant benchmarks and other relevant data.

6 Each party will be given equal time to be measured by a "chess clock" approach. All time
7 a party spends presenting (either argument, direct, cross or re-direct) will count against that party's
8 time. After opening statements, the hearing will begin with evidence on liability issues that affect
9 the aggregate estimation. The wildfire claimants will present their witnesses on these issues first,
10 with their witnesses subject to cross examination. The Debtors will subsequently present their
11 witnesses, subject to cross examination. The parties will then present and cross-examine witnesses
12 in the same manner on aggregate damages.

13 The Debtors propose the following schedule for an estimation hearing comprised of 8 to 12
14 court days.

- 15 • Opening statements (.5 day)
- 16 • The parties' expert and fact witness testimony on the following liability topics: (2 to 2.5
17 days per side – 4 to 5 days total)
 - 18 ○ Vegetation management
 - 19 ○ De-energization
 - 20 ○ Electric line operation, inspection and maintenance
- 21 • The parties' expert testimony on the following damages topics (2 to 3 days per side – 4 to
22 6 days total):
 - 23 ○ Property and land damage, including analysis of relevant benchmarks and other
24 relevant data
 - 25 ○ Relocation and displacement costs, including analysis of relevant benchmarks and other
26 relevant data
 - 27 ○ Agricultural and forestry losses, including analysis of relevant benchmarks and other
28 relevant data
 - General economic loss, including analysis of relevant benchmarks and other
 relevant data
 - Personal injury and wrongful death damages, including analysis of relevant
 benchmarks and other relevant data

- 1 ○ Emotional distress and annoyance and discomfort damages, including analysis of
2 relevant benchmarks and other relevant data
- 3 ○ Attorneys' fees, including analysis of relevant benchmarks and other relevant data
- 4 ○ Estimation of aggregate damages number for all Wildfire Claims that are not
 subject to an applicable settlement or plan support agreement

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